

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

IN RE)
)
JEFFREY ALLAN SMITH) CASE NO. 16-30838
)
Debtor(s))

OBJECTION TO MOTION FOR TURNOVER

Comes now the Debtor(s), by counsel, and object(s) to the Chapter 7 Trustee's Motion for Turnover filed in this case on February 22, 2017, on the grounds that the Debtor intends to convert this case to a Chapter 13 bankruptcy for the purpose of, *inter alia*, curing the mortgage arrearage on the Debtor's residence. The assets that currently comprise the Chapter 7 bankruptcy estate, of which certain assets are the subject of the Chapter 7 Trustee's Motion for Turnover, shall revert to the Debtor upon the conversion of this case to a Chapter 13 bankruptcy. The Debtor(s) hereby request(s) a hearing on this issue.

/s/ Nicholas C. Catsadimas
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that on March 15, 2017, the foregoing paper or pleading was duly electronically noticed or mailed via first class United States mail to the following:

Rebecca Hoyt Fischer, Rebecca@ladfislaw.com

Nancy J. Gargula, U.S. Trustee, 100 East Wayne Street, Room 555, South Bend, IN 46601

/s/ Nicholas C. Catsadimas
Nicholas C. Catsadimas